

DISTRICT PLAN REVIEW

Proposed Waimakariri District Plan - Submission

Clause 6 of Schedule 1, Resource Management Act 1991

Submitter details

(Our preferred methods of corresponding with you are by **email** and **phone**).

Full name: _____

Email address: _____

Phone (Mobile): _____ Phone (Landline): _____

Postal Address: _____ Post Code: _____

Physical address: _____ Post Code: _____
(if different from above)

Please select one of the two options below:

I **could not** gain an advantage in trade competition through this submission (go to Submission details, you do not need to complete the rest of this section)

I **could** gain an advantage in trade competition through this submission (please complete the rest of this section before continuing to Submission details)

Please select one of the two options below:

I **am** directly affected by an effect of the subject matter of the submission that:

- A) Adversely affects the environment; and
- B) Does not relate to trade competition or the effect of trade competition.

I **am not** directly affected by an effect of the subject matter of the submission that:

- A) Adversely affects the environment; and
- B) Does not relate to trade competition or the effect of trade competition.

Submission details

The specific provisions of the proposal that my submission relates to are as follows: *(please give details)*

My submission is that: *(state in summary the Proposed Plan chapter subject and provision of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons) (please include additional pages as necessary)*

I/we have included: _____ additional pages

I/we seek the following decision from the Waimakariri District Council: *(give precise details, use additional pages if required)*

Submission at the Hearing

I/we wish to speak in support of my/our submission

I/we do not wish to speak in support of my/our submission

If others make a similar further submission, I/we will consider presenting a joint case with them at the hearing

Signature

Of submitters or person authorised to sign on behalf of submitter(s)

Signature _____

Date _____

(If you are making your submission electronically, a signature is not required)

Important Information

1. The Council must receive this submission before the closing date and time for submissions.
2. Please note that submissions are public. Your name and submission will be included in papers that are available to the media and public. Your submission will only be used for the purpose of the District Plan review process.
3. Only those submitters who indicate they wish to speak at the hearing will be emailed a copy of the planning officers report (please ensure you include an email address on this submission form).

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- It is frivolous or vexatious
- It discloses no reasonable or relevant case
- It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- It contains offensive language
- It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Send your submission to: Proposed District Plan Submission
Waimakariri District Council
Private Bag 1005, Rangiora 7440

Email to: developmentplanning@wmk.govt.nz

Phone: 0800 965 468 (0800WMKGOV)

You can also deliver this submission form to one our service centres:

Rangiora Service Centre: 215 High Street, Rangiora

Kaiapoi Service Centre: Ruataniwha Kaiapoi Civic Centre, 176 Williams Street, Kaiapoi

Oxford Service Centre: 34 Main Street, Oxford

Submissions close 5pm, Friday 26 November 2021

Please refer to the Council website waimakariri.govt.nz for further updates

Form 5

Waka Kotahi NZ Transport Agency submission on a notified proposal for the Proposed Waimakariri District Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

26 November 2021

Development Planning Unit
Waimakariri District Council
Private Bag 1005
Rangiora 7440

via email: developmentplanning@wmk.govt.nz

This is a submission on a change proposed to the following plan:

Proposed Waimakariri District Plan

The specific provisions of the proposal that our submissions relate to are:

The proposed Waimakariri District Plan in its entirety to the extent that the proposed provisions have the potential to compromise Waka Kotahi NZ Transport Agency's (Waka Kotahi) statutory obligations in terms of providing an effective, efficient and safe land transport network.

The submission of Waka Kotahi is:

1. Waka Kotahi is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice to most daily transport needs.
2. Waka Kotahi is mandated under the Land Transport Management Act 2003 (LTMA), the Government Rounding Powers Act 1989 (GRPA) and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2021-2024 National Land Transport Programme (NLTP) Waka Kotahi has allocated significant investment in the Canterbury Region (including Waimakariri District) and is focussed on creating a safe, more resilient road network. In the Waimakariri District, as part of the Greater Christchurch area, integrated land use planning is promoted which will support the increased use of public transport, walking and cycling modes. In addition, Waka Kotahi is a co-funder of the local roading network. Waka Kotahi is, therefore, a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Proposed Waimakariri District Plan.

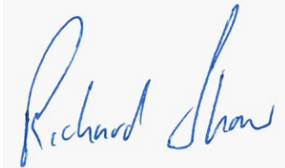
4. Overall, Waka Kotahi has an interest in the Proposed Waimakariri District Plan as a result of its role as a:
 - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;
 - Planner of land transport networks – to ensure the integration of infrastructure and land use to support liveable communities and the development of an effective and resilient land transport network for customers;
 - Provider of access to, and the use of, the land transport system – to shape smart, efficient, safe and responsible transport choices; and
 - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. The submission from Waka Kotahi seeks amendments to the proposed Waimakariri District Plan to ensure that Waka Kotahi can carry out its statutory obligations, reduce interpretation and processing complications for decision makers and to provide clarity for district plan users.
6. High level comments on the plan are set out below and the attached table (Table 1) provides more detailed comments and forms the bulk of the submission.
 - **Subdivision Chapter:** A key issue for Waka Kotahi with the subdivision chapter is in relation to the provision of transport infrastructure upgrades, and the requirement or expectation for Waka Kotahi to fund these (fully or partially). Waka Kotahi is unable to receive financial contributions from developers, and there is a risk through the subdivision process that funding falls through, resulting in upgrades being unable to be completed and adverse effects not appropriately addressed. Several suggestions are made to the proposed provisions so that these requirements or expectations on funding arrangements are removed.
 - **Signs Chapter:** Waka Kotahi has concerns with the general architecture of this chapter as the objectives and policies are relatively overarching and the linkages between the objectives/policies and the rules/standards is loose and fragmented. The number of sign types is generally confusing, and it is unclear why some sign types are managed differently to others when the likely effects are the same. In addition, the objectives and policies do not translate into the rule requirements particularly well, with more attention required to how the rules, standards and policy interact and the potential effects from each type of sign, so that any potential adverse effects are captured and managed appropriately. The submission points provided in Table 1 are one such way that these issues could be addressed, however, there may be other ways to resolve these issues.
 - **Rural Zones:** There should be further consideration given to traffic generation and access in rural environments, particularly to the effects of these arising from retail activities in this environment. The proposed rural rules are permissive towards retail activities in rural zones, however, the potential safety effects on the transport network are not sufficiently considered. Further requirements should also be included which require new activities accessed from the state highway to upgrade their existing access to the relevant standard, to achieve better safety outcomes.
7. Where a provision is not included in the appended table, Waka Kotahi generally supports the way it is drafted.
8. Waka Kotahi cannot gain an advantage in trade competition through this submission.

The following decision is sought from the local authority:

Amend the provisions of the proposed Waimakariri District Plan as detailed in Table 1 (attached) including further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Waka Kotahi request to be in heard support of its submission. If others wish to make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Waka Kotahi



Richard Shaw
Team Leader – Environmental Planning
Waka Kotahi NZ Transport Agency

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Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
Part 1 – Introduction and General Provisions				
Interpretation				
Definitions				
Certification	Definitions	Support	Waka Kotahi supports this definition as it relates to the Woodend Bypass designation conditions and was agreed through the notice of requirement process.	Retain as notified.
Reverse sensitivity	Definitions	Support	Waka Kotahi supports this definition as it provides clarity regarding potential reverse sensitivity effects on state highway infrastructure.	Retain as notified.
Road reserve	Definitions	Oppose	This definition has the same meaning as road corridor and, therefore, Waka Kotahi considers that this definition unnecessary.	Delete this definition and amend all references to 'road reserve' in the plan to 'road corridor'.
Part 2 – District Wide Matters				
Strategic Directions				
SD - Strategic Directions				
SD-O2 Urban development	Objective	Support in part	Waka Kotahi request that a clause recognising the importance of the transport network for integrated urban development and infrastructure be included as part of this objective.	Insert an additional clause in SD-O2 as follows: (x) <i><u>recognises the importance of infrastructure, including the land transport network in achieving integrated urban development;</u></i>

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SD-03 Energy and infrastructure	Objective	Support	Waka Kotahi supports this objective which recognises the importance of infrastructure, including the need to provide for and improve safe and efficient transport networks (including multi-modal transport networks), and the management of reverse sensitivity. Waka Kotahi supports the recognition of the operational and functional needs of infrastructure.	Retain as notified.
UFD - Urban Form and Development				
UFD-02 Feasible development capacity for commercial activities and industrial activities	Objective	Support in part	No target for commercial/industrial development has been identified in the District Plan. <i>Our Space 2018-2048 – Greater Christchurch 2050</i> refers to sufficiency of industrial and commercial development capacity for Waimakariri. A target of feasible development capacity for industrial/commercial/mixed-use development should be considered.	Provide further clarity on what feasible capacity for commercial and industrial activities entails – not necessarily in this provision explicitly, but as part of the district plan development.
UFD-P1 The density of residential development	Policy	Support in part	Each development area is required to achieve a density of between 12 to 15 households per hectare. A minimum of 12 households per hectare should be maintained to support <i>Our Space 2018-2048 – Greater Christchurch 2050</i> . Waka Kotahi	No direct amendments to the policy are requested, however, a minimum of 12 households per hectare should be maintained through the development area provisions. Further consideration into increasing the density from 12 households to 15

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			supports this part of the policy on the basis that it aligns with the <i>Our Space</i> document. However, where there are no infrastructure constraints, 15 households per hectare could be encouraged. Waka Kotahi supports Medium Density zoning being located such that these areas are well connected walkable locations. However, some of the proposed Medium Density zones in the various development areas (e.g Kaiapoi New Development Area) are not well connected for pedestrians and further work should be undertaken to ensure Medium Density zones are well connected for active transport modes.	households/hectare where there are no infrastructure constraints is suggested by Waka Kotahi to support medium density development. Waka Kotahi recommends that further consideration is given to multi-modal connections (including pedestrian connections) for Medium Density zones. This issue is further discussed in the Development Area section of this submission.
UFD-P2 Identification/ location of new Residential Development Areas	Policy	Support in part	Waka Kotahi supports the general intent of this policy, however, notes that clause (b) states: <i>occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required;</i> If there is insufficient existing or planned transport infrastructure to provide for new Residential	Waka Kotahi seek clarity in this provision in terms of where the onus lies if new infrastructure is required to facilitate a new development area. It is not always possible for infrastructure providers to provide new infrastructure to new development areas due to funding constraints. Amend clause (2) as follows:

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			Development Areas, Waka Kotahi queries if it is appropriate for a developer to pay for new infrastructure which will extend beyond the existing and planned networks? From the policy it is unclear where the onus lies if new infrastructure is required.	<p>2. for new Residential Development Areas, other than those identified by (1) above, avoid residential development unless located so that they:</p> <p>a. occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development;</p> <p>b. occur in a manner that makes use of existing and planned transport and three waters infrastructure, or <u>Where such infrastructure is not available, the developer shall upgrade, fund and or build infrastructure as required; ...</u></p>
UFD-P7 Mechanism, to provide additional Commercial and Mixed Use Zones	Policy	Support in part	It is suggested that future Commercial and Mixed-Use zones should be well connected with existing residential zones to enable multi-modal access. It is recommended that this policy is amended to provide for multi-modal access.	<p>Insert a new clause recognising the need for new commercial and mixed-use zones to provide for multi-modal access as follows:</p> <p><i>If proposed, ensure any plan change to create new, or expanded existing Commercial and Mixed Use Zones:</i></p> <ol style="list-style-type: none"> 1. improve commercial self-sufficiency within the town and the Waimakariri District; 2. are commensurate to the population growth forecast for the town subject to the plan change;

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<p>3. <i>consider and address any adverse effects that might undermine other town centres and local centres in the District; and</i></p> <p>4. <i><u>provide for multi-modal transport options;</u></i></p> <p>5. <i>address any development capacity shortfall as identified in the Future Development Strategy or WDDS; <u>and</u></i></p> <p>6. <i>is informed through the development of an ODP.</i></p>
UFD-P10 Managing reverse sensitivity effects from new development	Policy	Support in part	This policy does not currently recognise the potential safety effects that new development can have on existing infrastructure. Waka Kotahi request an amendment to provide for safety considerations.	<p>Amend clause (1) as follows:</p> <p>1. <i>Avoid residential activity that has the potential to limit the efficient, and effective <u>and safe</u> operation, and upgrade of critical infrastructure, strategic infrastructure, and regionally significant infrastructure, including noise sensitive activities within the Christchurch Airport Noise Contour, unless within an existing Residential Zone.</i></p>
Energy, infrastructure and transport				
EI - Energy and infrastructure				
E1-01	Objective	Support	Waka Kotahi support this objective, as it clearly recognises the need for infrastructure to be	Retain as notified.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
Provision of energy and infrastructure			efficient, effective, resilient and safe, and for it to be developed and maintained to benefit the well-being of the District.	
EI-02 Adverse effects of energy and infrastructure	Objective	Support in part	Waka Kotahi agree with seeking to ensure that adverse effects from infrastructure on the character and qualities of surrounding environments and community well-being are managed. However, it is considered important that the objective also includes acknowledgement that the ability to manage effects also needs to take into account the functional and operational needs of infrastructure. Currently, this is acknowledged in EI-P5 but not at the objective level.	Amend EI-02 as follows: <i>Adverse effects of energy and infrastructure on the qualities and characteristics of surrounding environments and community well-being are avoided, remedied or mitigated, while recognising the functional needs and operational needs of energy and infrastructure.</i>
EI-03 Effects of other activities and development on energy and infrastructure	Objective	Support	Waka Kotahi support the outcome of ensuring that infrastructure is not constrained or compromised by activities and development. Waka Kotahi also supports explicit acknowledgement that reverse sensitivity is one way that infrastructure can be constrained or compromised.	Retain as notified.
TRAN – Transport				

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
TRAN-01 A safe, resilient, efficient, integrated and sustainable transport system	Objective	Support	Waka Kotahi support this objective as it seeks an integrated transport system and provides clear direction on the outcomes the transport system should provide. In particular, Waka Kotahi supports recognition of the link between the transport system and: <ul style="list-style-type: none"> • wellbeing/liveability, • reference to all transport modes • the need to be responsive to future needs and changing technology, and • reducing dependency on private motor vehicles. 	Retain as notified.
TRAN-03 Adverse effects from the transport system	Objective	Support	Waka Kotahi agree with the focus of this objective, being that the District's transport system is to provide for the needs of people and freight, while also avoiding, remedying or mitigating adverse effects of the transport system.	Retain as notified.
TRAN-04 Effects of activities on the transport system	Objective	Support in Part	Waka Kotahi generally support the direction to avoid, remedy or mitigate the adverse effects of activities on the District's transport system. However, the objective could be expanded to provide clear direction on the outcome to be	Amend TRAN-04 as follows: <i>Adverse effects on the District's transport system from activities, including reverse sensitivity, are avoided, remedied or mitigated, so that the transport system is not constrained or compromised.</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			achieved through any avoidance, remediation or mitigation measures - similar to the direction provided in EI-O3. Waka Kotahi consider that the objective should be expanded to include reference to the measures being applied, to ensure the transport system is not constrained or compromised.	
TRAN-P1 Recognising the benefits of, and providing for, transport	Policy	Support in part.	Waka Kotahi supports the direction of this policy which recognises the benefits of transport and how various aspects of the transport system will be provided for or managed. However, clause (2) of the policy, which relates to managing effects, should be expanded to take into account the functional and operational needs of infrastructure.	Amend TRAN-P1 as follows: <i>Recognise the benefits of transport by:</i> <ol style="list-style-type: none"> <i>enabling the maintenance, repair, removal or minor upgrade of the transport system including land transport infrastructure;</i> <i>ensuring adverse effects of more than minor or significant upgrades to, or the development of new, transport connections and land transport infrastructure are avoided, remedied or mitigated, taking into account the functional needs and operational needs; and</i> <i>...</i>
TRAN-P2	Policy	Support in part	Waka Kotahi generally supports the direction in this policy. However, it is unclear how clauses 6, 7 & 8	Consider deleting clauses 5, 6, 7 & 8 from this policy and considering if they are better situated in the

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
Environmentally sustainable outcomes			are related to transport, as they appear to be broader measures relating to environmental sustainability that are not specific to transport. Similarly, it is not clear if clause 5 is intended to be specific to road construction (such as roads, accesses and pathways), or construction more broadly.	Pūngao me te hanganga hapori – Energy and infrastructure chapter. Alternately amend these clauses so that it is clearer how they relate to transport specifically.
TRAN-R5	Rule	Support in part	Waka Kotahi requests that this rule is amended so that any new access onto the state highway requires resource consent, so the effects from the access can be considered properly, and advice provided from Waka Kotahi so that the potential adverse safety effects on the state highway are adequately considered.	Waka Kotahi requests that TRAN-R5 is amended as follows: TRAN-R5 Formation of a new vehicle crossing Activity status: PER Where: <ol style="list-style-type: none"> Any activity that includes the formation of a new vehicle crossing shall comply with the design standards for new vehicle crossings in TRAN-S3 below. <u>Is not onto a state highway.</u> Activity status when compliance is not achieved: as set out in TRAN-S3.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought												
Table TRAN-19: Minimum sight distances from vehicle crossings	Appendix	Oppose in part	Table TRAN-19 lists minimum sight distances from vehicle crossings for posted speed limits. Waka Kotahi seek clarification on what these sight distances have been based on, as they do not align with the NZTA Policy Planning Manual, which requires the following site distances: 70 km/hr = 170m 80 km/hr=203m 90 km/hr=240m 100 km/hr= 282m Waka Kotahi also request clarification on why different distances have been provided for 'residential' and 'other' activities.	Amend Table TRAN-19 as follows: <i>Table TRAN 19: Minimum sight distances from vehicle crossings</i>												
				<table><tr><th><i>Posted speed limit (km/hr)</i></th><th><i>Residential All activities except high traffic generators (m)</i></th><th><i>Other activity (m)</i></th></tr><tr><td>30</td><td>40</td><td></td></tr><tr><td>40</td><td>60-89</td><td>75</td></tr><tr><td>50</td><td>80-113</td><td>100</td></tr></table>	<i>Posted speed limit (km/hr)</i>	<i>Residential All activities except high traffic generators (m)</i>	<i>Other activity (m)</i>	30	40		40	60-89	75	50	80-113	100
				<i>Posted speed limit (km/hr)</i>	<i>Residential All activities except high traffic generators (m)</i>	<i>Other activity (m)</i>										
				30	40											
				40	60-89	75										
50	80-113	100														

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought		
				60	100 <u>140</u>	125
				70	120 <u>170</u>	150
				80	150 <u>203</u>	180
				90	170 <u>240</u>	215
				100	200 <u>282</u>	250
Hazards and Risks						
NH – Natural hazards						
NH-O2 Infrastructure in natural hazard overlays	Objective	Support	This objective provides direction on how infrastructure is to be managed within natural hazard overlays. This includes avoiding critical infrastructure in high flood hazard areas, unless	Retain as notified.		

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			<p>there is a functional or operational need for the location or route.</p> <p>Waka Kotahi supports this in principle, particularly the recognition that some critical infrastructure will have a functional or operational need to be located in certain areas that are subject to natural hazards. With respect to roading, this includes that due to its linear nature, it is not practicable, or sometimes possible, to avoid crossing flood affected areas. At an objective level, it is considered appropriate to retain reference to the operational or functional need only, but as set out below (NH-P13), Waka Kotahi consider that the related policy should be expanded to include explicit reference to linear infrastructure.</p>	
NH-P13 New above ground critical infrastructure and upgrading of critical infrastructure	Policy	Support in part	<p>Waka Kotahi supports this policy as it allows for critical infrastructure in high flood hazard areas, where there is a functional or operational need for the location. However, it would be more helpful if the policy specifically acknowledged that the linear nature of some infrastructure, such as roading, is one reason why it may not be practicable, or</p>	<p>Amend NH-P13 as follows:</p> <p><i>Only allow for the new and upgrading of existing above ground critical infrastructure in high flood hazard or high coastal flood hazard areas where:</i></p> <ol style="list-style-type: none"> <i>1. there is a functional need or operational need for that location, including as a result of the</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
within high flood hazard areas			sometimes possible, to avoid crossing flood affected areas.	<i>linear nature of some infrastructure, and there are no practical alternatives;</i>
NH-R6 Above ground critical infrastructure	Rule	Support in part	<p>This rule provides a permitted activity status for above ground critical infrastructure, provided it meets the criteria set out in the rule. This includes a requirement that the profile, contour or height of the land is not permanently raised by more than 0.25m when compared to natural ground level, and the need to obtain a Flood Assessment Certificate to confirm the site is not within a high flood hazard area. The s.32 evaluation does not identify the basis for the 0.25m threshold.</p> <p>Unlike other activities, the need to obtain a Flood Assessment Certificate for any type of critical infrastructure is also considered to be inefficient. Waka Kotahi note that the s.32 evaluation (page 19) states that where the risk to life and property is relatively low, then the rules are permissive, including for “non-natural hazard sensitive activities” in all hazard areas. Waka Kotahi query if the standards reflect this.</p>	Amend, or clarify the basis for the 0.25m threshold. Reconsider the requirement for a Flood Assessment Certificate to be obtained for any type of critical infrastructure.

Item	Proposed Plan Amendment Section	Support / Support in Part / Oppose / Oppose in Part	Comments/Reasons	Relief Sought
Natural environment values				
NFL – Natural features and landscapes				
NFL-O1 Outstanding Natural Features	Objective	Oppose in Part	Waka Kotahi recognise the need to manage the adverse effects of activities on the values of outstanding natural features, and generally support the aim of protecting those values. However, there may be instances when other outcomes sought in the plan – for example those relating to energy and infrastructure (including transport) – conflict with the achievement of absolute protection. It is also important to note that s6(b) of the RMA directs that these features are protected from “inappropriate” subdivision, use and development. The proposed wording appears to take the approach that any adverse effects on the values of these features will always be inappropriate.	Amend NFL-O1 as follows: <i>Outstanding natural features are protected, as far as practicable, from land use or development that would have inappropriate adversely-affect effects on the values of these features.</i>
NFL-O2 Outstanding Natural Landscapes	Objective	Oppose in Part	Waka Kotahi recognise the need to manage the adverse effects of activities on the values of outstanding natural landscapes and generally support the aim of protecting those values. However, there may be instances when other outcomes sought in the plan – for example those	Amend NFL-O2 as follows: <i>Outstanding natural landscapes are protected, as far as practicable, from land use or development that would have inappropriate adversely-affect effects on the values of these landscapes.</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			relating to energy and infrastructure (including transport) – conflict with the achievement of absolute protection. It is also important to note that s6(b) of the RMA directs that these landscapes are protected from “inappropriate” subdivision, use and development. The proposed wording therefore appears to take the approach that any adverse effects on the values of these features will always be inappropriate.	
NFL-P1 Protect Outstanding Natural Features	Policy	Oppose in part	Waka Kotahi is concerned that the absolute nature of this policy does not acknowledge that some activities, when considered in the context of the wider outcomes sought across the proposed Plan as a whole, might necessarily detract from the values of outstanding natural features. There may be instances where, in providing for the transport system, effects have been avoided, remedied or mitigated as far as practicable, but there is still some adverse effect on the values of an outstanding natural feature. Waka Kotahi consider that a more nuanced approach is required, similar	Amend NFL-P1 as follows: <i>Recognise the values of the outstanding natural features identified in NFL-APP1 and protect them from the adverse effects of activities and development by:</i> 1. <i>avoiding use and development that detracts from the very high biophysical values and high sensory and associative values identified in NFL-APP1 for the Waimakariri River, <u>except where activities have a functional need or operational need to be located within the features and provided the adverse effects</u></i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			to that taken in relation to natural character (NATC-P5 and NATC-P6).	<p><u>on values are avoided, remedied or mitigated;</u></p> <p>2. <i>avoiding use and development that detracts from the very high biophysical and sensory values, and high associative values of the Ashley River/Rakahuri Saltwater Creek Estuary identified in NFL-APP1, including on:</i></p> <ul style="list-style-type: none"> <i>a. coastal physical processes;</i> <i>b. ecological habitat and indigenous biodiversity; and</i> <i>c. the experience of the elements and processes of (a) and (b);</i> <p><u>except where activities have a functional need or operational need to be located within the Ashley River/Rakahuri Saltwater Creek Estuary and provided the adverse effects on values are avoided, remedied or mitigated;</u></p> <p>...</p>
NFL-P3 Protect Outstanding	Policy	Oppose in part	Waka Kotahi is concerned with the absolute nature of this policy does not acknowledge that some activities, when considered in the context of the wider outcomes sought across the proposed Plan	<p>Amend NFL-P3 as follows:</p> <p><i>Recognise the values of the outstanding natural landscapes identified in NFL-APP1 and protect them</i></p>

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Natural Landscapes			as a whole, might necessarily detract from the values of outstanding natural features. There may be instances where in providing for the transport system, effects have been avoided, remedied or mitigated as far as practicable, but there is still some adverse effect on the values of an outstanding natural feature. Waka Kotahi consider that a more nuanced approach is required, similar to that taken in relation to natural character (NATC-P5 and NATC-P6).	<p><i>from the adverse effects of activities and development by:</i></p> <ol style="list-style-type: none"> <i>avoiding use and development that detracts from the very high biophysical values and high sensory and associative values of the Puketeraki Range and Oxford Foothills identified in NFL-APP1, in particular on the:</i> <ol style="list-style-type: none"> <i>exposed alpine environments;</i> <i>sheltered densely forested slopes and gullies of the Oxford Hills;</i> <i>indigenous vegetation; and</i> <i>recreational values;</i> <p><u><i>except where activities have a functional need or operational need to be located within the Puketeraki Range and Oxford Foothills and provided the adverse effects on values are avoided, remedied or mitigated;</i></u></p> <p>...</p>
Subdivision				
SUB – Subdivision				
SUB-02	Objectives	Support in part	Waka Kotahi supports that subdivision provisions provide for efficient and sustainable provision, use	Amend SUB-02 as follows:

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Infrastructure and transport			and maintenance of infrastructure; and a legible, accessible, well connected transport system for all transport modes. However, safety is a key component of transport and associated infrastructure. It is therefore, recommended that safety is included within the objective.	<i>Efficient and sustainable provision, use and maintenance of infrastructure; and a legible, accessible, <u>safe</u>, well connected transport system for all transport modes.</i>
SUB-P4 Integration and connectivity	Policy	Support	Waka Kotahi supports this policy as it ensures that integration and connectivity is considered for subdivision in urban environments, which includes effective integration of subdivision patterns and multi-modal connections. The policy also seeks to achieve integration and connectivity on boundaries between new and existing development through the management of significant adverse effects, including reverse sensitivity, and the continuation of transport and pedestrian cycle linkages.	Retain as notified.
SUB-P6 Criteria for Outline	Policy	Support in part	Waka Kotahi supports the use of Outline Development Plans and generally supports the criteria set out for these within SUB-P6.	Amend clause (2) as follows: <i>2. be prepared in accordance with the following:</i>

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Development Plans			However, Waka Kotahi questions whether it is appropriate to set out how required infrastructure will be funded through the provisions and associated rules of an Outline Development Plan, which is identified in SUB-P6(2)(e). There are often situations where there are changes to land use from other activities that may need to contribute to the same required infrastructure upgrades that are unknown at the time, and there are times where cost sharing arrangements may be reached at a later date. The key is that there is agreement and/or a process that acknowledges that the required infrastructure will be provided.	<i>e. indicate how required infrastructure will be provided and how it will be funded;</i>
SUB-P8 Infrastructure	Policy	Support in part	Waka Kotahi generally supports the matters set out in the policy which are intended to achieve integrated and comprehensive infrastructure with subdivision. However, with respect to clause (1), there are risks with imposing cost-sharing arrangements proportional to the benefit received, when it involves an upgrade to the state highway network. This is because the policy could be used to argue that the subdivision triggering the	Amend clause (1) as follows: <i>Achieve integrated and comprehensive infrastructure with subdivision by ensuring:</i> 1. <i>upgrade of existing infrastructure where the benefit is solely for the subdivision and subsequent development, or otherwise provide for cost-sharing or other arrangements for any upgrade, such as</i>

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			upgrade need only fund a portion of the cost of the infrastructure, relying on Waka Kotahi to fund the remainder of the upgrade. Waka Kotahi cannot guarantee that such funding would be available. There is then a risk that funding cannot be secured to pay the remaining non-developer funded cost of the infrastructure, and the potential effects related to the infrastructure are then not appropriately addressed.	<i>financial contributions, that are proportional to the benefit received;</i> 2. ...
SUB-R1 Boundary Adjustment	Rule	Support	Waka Kotahi generally supports SUB-R1 as long as the matters of control are appropriate to manage the potential effects on the state highway network, such as access and/or reverse sensitivity effects from noise. Submission points are made on SUB-MCD3 and SUB-MCD10 to address this. The wording as currently proposed for this rule and the associated matters of controls could limit the ability for Waka Kotahi to manage the potential effects from subdivision on the state highway. Provided that the matters of control are strengthened to adequately address appropriate transport effects and reverse sensitivity of noise	Retain as notified, subject to amendment to SUB-MCD3 and SUB-MCD-10.

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			from the state highway, then Waka Kotahi consider this rule appropriate.	
SUB-R2 Subdivision	Rule	Support	<p>Waka Kotahi generally supports SUB-R2 as long as the matters of control are appropriate to manage the potential effects on the state highway network, such as access and/or reverse sensitivity effects from noise. Submission points are made on SUB-MCD3 and SUB-MCD10 to address this.</p> <p>The wording as currently proposed for this rule and the associated matters of controls could limit the ability for Waka Kotahi to manage the potential effects from subdivision on the state highway. Provided that the matters of control are strengthened to adequately address appropriate transport effects and reverse sensitivity of noise from the state highway, then Waka Kotahi consider that this rule is appropriate.</p>	Retain as notified, subject to amendment to SUB-MCD3 and SUB-MCD-10.
SUB-S6 Access to a strategic road or arterial road	Standards	Support in part	Waka Kotahi supports that any subdivision of a site in Rural Zone that has access onto a strategic road or arterial road shall be jointly served by a single accessway.	<p>Amend the wording as follows:</p> <ol style="list-style-type: none"> <i>Any subdivision of a site in any Rural Zone that creates two or more new allotments that access onto a strategic road or arterial road, shall be jointly served by a single accessway.</i>

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			<p>However, this does not address the potential adverse safety effects of the increased use of an existing substandard access. An existing access may be used for additional allotments in a Rural Zone, but this access may not be designed to the appropriate standard or be in a poor location (limited visibility, access separation, etc). In this instance the standard would allow for the increased use of a non-complying access and would not trigger an additional consent requirement, or a requirement to upgrade the access. Additional allotments will have additional vehicle movements and may result in safety risks to road users. It is recommended that the standard be amended to require any access location on the state highway in a Rural Zone, to be upgraded to meet the vehicle crossing requirements in the transport chapter. Where an existing crossing does not meet the standards, this would require either that the crossing is upgraded, or consideration of the aspects of non-compliance would be triggered.</p>	<p><u>Where the accessway is off a state highway, any existing vehicle crossing shall comply, or be upgraded to comply, with TRAN-S5.</u></p>

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SUB-S16 Rural drainage	Standard	Oppose in part	<p>The state highway network includes a variety of stormwater infrastructure, which includes swales, drains and stormwater ponds. The standard requires new allotments in rural zones to connect to a public drain if this is within the rural drainage area.</p> <p>Waka Kotahi questions whether the state highway infrastructure for stormwater is considered a public drain, as this has not been defined. If it does constitute as a public drain, then there could be a risk to the Waka Kotahi. The allotments could connect to the state highway infrastructure and Waka Kotahi would then carry the risk for any discharge. Waka Kotahi does not support that this standard apply to the state highway network.</p> <p>Waka Kotahi is also unsure on where a rural drainage area is located and/or how it is defined.</p>	Provide clarity by defining what is considered to be a public drain and identifying where the rural drainage area is located within the District. Waka Kotahi request that the definition for a public drain shall exclude the state highway stormwater infrastructure.
SUB-ANX	Advice Note	New	Waka Kotahi supports the requirement for any allotment created to have legal and physical access to a legal road. However, it is recommended that an advice note is included in this standard to make reference to Limited Access Roads (LAR) under the	Include a new advice note stating that Limited Access Roads must be considered to ensure the properties have frontage to legal road.

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			Government Roding Powers Act 1989 (GRPA). This will provide that appropriate consideration is given to a section of road with a LAR as this is not considered legal road unless appropriate approvals under Section 93 of the GRPA are provided by the roading authority.	
SUB-MCD3 Property access	Matters of Control and Discretion	Support in part	<p>Waka Kotahi supports that the matters of control and discretion for property access makes provision for appropriate transport outcomes, which includes location and design of vehicle crossings, footpaths and cycleways.</p> <p>However, the matters of control and discretion should also allow for the consideration of the appropriateness of any existing vehicle crossing when any additional allotments will be sharing that crossing. This is because there may be times where the vehicle crossing is existing but not in the safest location, such as limited visibility or reduced vehicle crossing separation. Therefore, the matters of control/discretion should explicitly provide for the consideration of upgrades or alternative access options.</p>	<p>Amend SUB-MCD3 as follows:</p> <p><i>Property access</i></p> <ol style="list-style-type: none"> 1. <i>The extent to which the subdivision makes provision for:</i> <ol style="list-style-type: none"> a. <i>the location, design, lighting, alignment and pattern of roads in relation to allotments;</i> b. <i>the provision of access, including consideration of the need for any upgrades to existing accesses;</i> c. <i>the location, design, and provision of vehicle crossings in particular, taking into account infrastructure and street trees in the roading corridor;</i> d. <i>the location and design of footpaths and cycleways including their convenience,</i>

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				<i>safety and separation from roads by visual and/or physical means; and e. road reserves and links to future subdivision on adjoining land.</i>
SUB-MCD10 Reverse sensitivity	Matters of Control and Discretion	Support in part	Waka Kotahi supports the inclusion of reverse sensitivity assessment. However, as currently proposed it focuses on lawfully established rural activities. Consideration should be given to the recognition of noise and/or vibration effects from existing infrastructure, such as transport infrastructure.	Amend SUB-MCD10 as follows: <ol style="list-style-type: none"> <i>Any need to provide a separation distance for any residential unit or minor residential unit from existing activities, and any need to ensure that subsequent owners are aware of potential reverse sensitivity issues from location near lawfully established rural activities, including but not limited to intensive farming.</i> <i>Any measures required to minimise potential reverse sensitivity effects, such as noise, through subdivision design, provision of screening, structures or other mitigation methods.</i>
General district wide matters				
EW – Ketuketu whenua – Earthworks				

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EW-P1 Enabling Earthworks	Policy	Support in part	Waka Kotahi request that an additional clause is inserted to enable earthworks that are necessary to maintain infrastructure.	<p>Amend the proposed policy as follows: <i>Enable earthworks where they:</i></p> <ol style="list-style-type: none"> <i>1. are compatible with the character, values and qualities of the location and surrounding environment;</i> <i>2. <u>are necessary for the continued operation and maintenance of existing infrastructure;</u></i> <i>3. avoid, remedy or mitigate any adverse effects on any sites or areas identified as ONL, ONF, SAL, Coastal Environment Overlay, SNA, sites and areas of significance to Māori, Natural Open Space Zone, surface freshwater bodies and their margins, or any notable tree, historic heritage or heritage setting;</i> <i>4. minimise erosion and avoid adverse effects from stormwater or sediment discharge from the site;</i> <i>5. avoid increasing the risk to people or property from natural hazards;</i>

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				<p>6. <i>maintain the stability of land including adjoining land, infrastructure, buildings and structures;</i></p> <p>7. <i>minimise the modification or disturbance of land, including any associated retaining structures, on the visual amenity values of the surrounding area; and</i></p> <p>8. <i>minimise adverse dust, vibration and visual effects beyond the site.</i></p>
EW-P2 Earthworks within Flood Assessment Overlays	Policy	Support in part	Waka Kotahi recognise that earthworks are required in flood prone areas for a variety of reasons and support the intention that the effects from earthworks in a flood prone location should be managed so that they do not increase the flood risk on neighbouring sites, however, this should be expanded so that earthworks do not increase the flood risk to infrastructure also.	<p>Amend the proposed policy as follows: <i>Allow earthworks within the Urban Flood Assessment Overlay and Non-Urban Flood Assessment Overlay where:</i></p> <ol style="list-style-type: none"> <i>the earthworks do not increase the flooding risk to the site or neighbouring sites <u>or infrastructure</u> through the displacement of flood waters;</i> <i>the earthworks associated with proposed subdivision, development or use do not increase the risk to life or property; and</i> <i>the ability to convey flood waters is not impeded as a result of the earthworks.</i>

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EW-R3 Earthworks for maintenance of public water races or drains	Rule	Oppose in part	As per the above comment on SUB-S16 (Rural drainage), if a definition for public drain is included which excludes state highway stormwater infrastructure, then no changes are sought to this rule. However, if this rule includes maintenance works on state highway stormwater infrastructure, then it is requested that works be exempt from standards EW-S2 and EW-S6 as maintenance activities are often located in close proximity to a site boundary and on a steeper slope. While the majority of state highway stormwater infrastructure is located within the designated road corridor, there may be areas where this is not the case and maintenance is still required to ensure stormwater is appropriately managed.	Include a definition for public drain which excludes state highway stormwater infrastructure as per the comments provided on SUB-S16.
EW-MD1 Activity operation, scale, form and location	Matters of Discretion	Support subject to amendment	Waka Kotahi request that this matter be extended so that the potential effects on all infrastructure can be considered, not just effects on the National Grid.	Amend as follows: <i>Activity operation, scale, form and location</i> 1. <i>Location, volume and area of earthworks.</i> 2. <i>The operational need or functional need for the earthworks in the location.</i>

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				<p>3. Any effects on the natural character and amenity values of the site and surrounding area.</p> <p>4. Any effects on archaeological sites, heritage values or the heritage setting of the site or within the surrounding area.</p> <p>5. Any disturbance of culturally significant sites and any proposed mitigation measures.</p> <p>6. Any effects on the health and structural integrity of any notable tree and any effects on the values that have been identified for the notable tree.</p> <p>7. Public health and safety including contingency provisions for emergency response.</p> <p>8. Mitigation including fencing, planting and landscaping.</p> <p>9. Effects on soil quality.</p> <p>10. Final contour and ground level resulting from excavation or filling.</p> <p>11. Vehicle movements associated with earthworks.</p>

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				<p>12. Any effects on the operation, maintenance, upgrade and development of the National Grid critical infrastructure.</p> <p>13. Any constraint on the future development potential of the site or surrounding sites.</p>
EW-MD8 Outstanding natural features and landscapes	Matter of discretion	Oppose in part	This matter of discretion does not recognise the functional needs and operational needs of infrastructure. Waka Kotahi request that this matter of discretion for earthworks in an Outstanding natural feature or landscape is amended to reflect the changes requested in the NFL Āhautanga o te whenua – Natural features and landscapes chapter.	<p>1. Where earthworks are located in any ONF or ONL:</p> <ul style="list-style-type: none"> a. the timing, duration, area and location of the activity; b. any vegetation that is to be retained; c. any vegetation screening and backdrop; d. the relationship of the activity to landform including prominent ridgelines; e. natural character values, amenity values and landscape values, including revegetation type and density; f. earthworks location and management, including revegetation, of cuts and fills; and g. any effects on the stability and life-supporting capacity of soil; <u>and</u> h. <u>any functional needs and operational needs of critical infrastructure.</u>

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LIGHT – Tūramarama – Light				
LIGHT-O1 Outdoor lighting	Objective	Support	Waka Kotahi supports this objective which recognises the importance of outdoor lighting to enable a range of activities, including transportation, to occur beyond daylight hours, while maintaining the safe operation of the transport system.	Retain as notified.
LIGHT-P1 Outdoor lighting	Policy	Support in part	Waka Kotahi supports enabling outdoor lighting for night-time activities, safety and security while ensuring that it does not adversely affect the safe, efficient and effective functioning of the state highway network. However, Waka Kotahi seeks a minor amendment to the wording of the policy so that potential adverse effects on transport safety can be considered more broadly, rather than being limited to distraction or interference.	Amend LIGHT-P1 as follows: <i>Enable outdoor lighting for night-time activities, safety and security while:</i> <ol style="list-style-type: none"> <i>remedying or mitigating adverse effects from light spill or glare on the receiving environment by controlling the intensity, shielding, colour temperature and direction of light;</i> <i>ensuring that outdoor lighting does not <u>adversely affect transport systems, including distractions</u> distract traffic or interfere with any traffic aids and signals on the road, air or sea; and</i> <i>ensuring lighting is compatible with the zone or zones in which the light spill and glare is</i>

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				<i>received by applying the light levels for the receiving zone.</i>
LIGHT-R1 Navigational lighting, traffic signals, illuminated official signs for traffic, and temporary lighting for emergency response	Rule	Support	Waka Kotahi supports enabling outdoor lighting for navigation, traffic signals, illuminated official signs for traffic, and temporary lighting for emergency response.	Retain as notified.
LIGHT-R3 General use of outdoor lighting	Rule	Support	Waka Kotahi supports enabling outdoor lighting where it can comply with LIGHT-S1 and LIGHT-S2, subject to the minor amendments to these standards recommended in submission points below.	Retain as notified.
LIGHT-S1 General standards for light	Standard	Support in part	Waka Kotahi supports controlling levels of horizontal and vertical light spill onto adjoining sites. However, further clarification is sought as to	Provide clarification on how this rule applies to roads and controls the effects of light spill onto roads and the reasoning on why this standard is appropriate to apply to roads (if that is the case).

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			<p>what the intention of this rule is with regard to controlling light spill onto roads.</p> <p>It is unclear whether a road would adopt the adjoining zone limits or whether there should be separate limits for light spill onto roads.</p> <p>Waka Kotahi has concerns about excessive light spill onto roads and the adverse effects this may have on the safe, efficient and effective functioning of the land transport network. If this rule does apply to roads then evidence on why this standard is appropriate is requested.</p>	
LIGHT-S2 Control of glare	Standard	Support in part	<p>Waka Kotahi supports managing glare from artificial outdoor lighting by requiring that it be directed away from and/or screened from adjacent roads. This prevents safety risks associated with the effects of glare on road users. However, Waka Kotahi seeks that this applies to all artificial outdoor lighting sources, not just fixed lighting, as the effects of glare are not just limited to fixed lighting. Waka Kotahi supports the inclusion of an advice note which clarifies that the requirement for fixed outdoor lighting to be directed away from roads,</p>	<p>Amend LIGHT-S2 as follows:</p> <ol style="list-style-type: none"> 1. <i>Any fixed outdoor lighting shall be:</i> <ol style="list-style-type: none"> a. <i>orientated such that the peak output intensity is directed at least 20° below horizontal, and be aimed away from adjacent sites, roads, footpaths and cycle paths, and from navigation sight lines for sea or air navigation.</i>

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			footpaths and cycle paths does not apply to lighting provided within, and specifically to illuminate, these facilities.	
LIGHT-AN1	Advice Note	Support	Waka Kotahi supports the inclusion of an advice note which clarifies that illuminated or digital signs are also subject to the applicable rules within the signs chapter.	Retain as notified.
LIGHT-MD1 Outdoor lighting	Matters of Discretion	Support	Waka Kotahi supports Council's discretion to consider the effects of outdoor lighting on any activity sensitive to light including effects on the efficient and effective functioning of any road, and the safety of road users.	Retain as notified.
NOISE – Noise				
NOISE-O2 Reverse Sensitivity	Objective	Support	Waka Kotahi supports that the objective recognises that regionally significant infrastructure and strategic infrastructure are not to be adversely affected by reverse sensitivity effects from noise sensitive activities.	Retain as notified.
NOISE-P1 Minimising adverse noise effects	Policy	Support	Waka Kotahi supports that adverse noise effects are required to be minimised through sound insulation or limiting the location of noise sensitive	Retain as notified.

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			activities where they may be exposed to noise from existing activities.	
NOISE-P3 Rail and roads	Policy	Support	Waka Kotahi supports that the operation of road infrastructure is protected through this policy by identifying locations where acoustic mitigation is required by new noise sensitive activities.	Retain as notified.
NOISE-R16 Residential units and minor residential units within 80m of an arterial road, strategic road or rail designation	Rule	Oppose in part	Waka Kotahi supports the noise mitigation requirements for residential units adjacent to the State Highway and the design and construction requirements to achieve indoor noise sound levels. However, it is currently proposed that this only apply to residential units within 80m of the state highway. Waka Kotahi considers that there are many areas of the State Highway network where noise sensitive activities within 100m of the edge of the sealed road should mitigate noise effects generated from the state highway. The current rule would result in a shortfall of 20m where noise mitigation may be necessary.	Amend the title/application of NOISE-R16 as follows, so that this rule applies to residential units and minor residential units within 100 m of the state highway: <i>NOISE-R16: Residential units and minor residential units within 80m <u>100m</u> of an arterial road, strategic road or rail designation.</i>
NOISE-MD1 Noise	Matters of Control / Discretion	Support	Waka Kotahi supports that the matters of discretion for noise include consideration of the effects on human health and well-being from noise generation from the receiving environment.	Retain as notified.

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NOISE-MD2 Management of noise effects	Matters of Control / Discretion	Support	Waka Kotahi supports that the management of noise effects can be addressed through several means, such as the extent and effectiveness of noise insulation, through screening of structures, distance from noise sources, through alternative technologies or materials, and that these potential measures can also be supported through the provision of a report from an acoustic specialist.	Retain as notified.
NOISE-MD3 Acoustic insulation	Matters of Control / Discretion	Support	Waka Kotahi supports the matters of discretion given to acoustic insulation, which allows the consideration of the ability to provide effective acoustic insulation through alternative technologies or materials. It also allows consideration of the extent to which reduced levels of acoustic insulation is acceptable when other means of mitigation of adverse noise effects is provided and through reporting from an acoustic specialist to ensure that the amenity values, health and safety of occupants or residents is maintained.	Retain as notified.
SIGN – Ngā tohu – Signs				

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SIGN-O1 Safety, well-being and amenity	Objective	Support	Waka Kotahi supports the provision of signage to provide for the District's economic and community well-being without compromising transport safety.	Retain as notified.
SIGN-P1 Enable specific signs	Policy	Support in part	<p>Waka Kotahi is concerned that this policy addresses numerous types of signs, and it is confusing as to how it aligns with the rule framework and the different outcomes sought in relation to different types of signs. As such, it is recommended that the policy is amended to provide clear and targeted guidance for each type of sign.</p> <p>Waka Kotahi supports the need to enable official signs to ensure the safe functioning of the transport network. However, as official signs are permitted and not subject to any standards, it is not clear how the part of the policy referring to management of effects is implemented through the rule.</p> <p>Waka Kotahi also support provision for community signs of a non-commercial nature, where their adverse effects are appropriately managed.</p> <p>Community signs are subject to standards, and therefore, align with the policy direction in terms of</p>	<p>Delete SIGN-P1, and replace with three new policies, as follows:</p> <p><i>Support:</i></p> <ol style="list-style-type: none"> 1. the safe functioning of activities by enabling, while managing the effects of, official signs, off-site directional signs, and community signs; and 2. the economic viability and functionality of activities within Commercial and Mixed Use Zones and Industrial Zones by enabling, while managing the effects of, on-site signs. <p><u>Official signs</u> <u>Support the safe functioning of activities by enabling official signs.</u></p> <p><u>Community signs</u></p>

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			<p>managing their effects. However, it is not clear how community signs relate to the safe functioning of activities.</p> <p>Waka Kotahi consider it better to have a single policy for official signs and a separate policy for community signs, recognising that there are potential adverse effects from community signs that need to be managed.</p> <p>Waka Kotahi also supports enabling on-site signs which contribute to the economic viability and functionality of activities, where their effects on the safety of the transport system are adequately managed. It is recommended that a separate policy is inserted for on-site signs which aligns with this. It is also recommended that reference to industrial and commercial zones are removed, as the permitted activity rule for on-site signs relates to all zones, therefore, on-site signs are anticipated across all zones, and are not just limited to industrial and commercial zones. However, the different standards applied in different zones reflect the different amenity values of each zone, and it is suggested that this is referenced in the policy.</p>	<p><u>Enable community signs while managing their adverse effects.</u></p> <p><u>On-site signs</u> <u>Enable on-site signs to support the economic viability and functionality of activities, while managing their adverse effects as appropriate to the surrounding environment.</u></p>

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			<p>Regarding off-site directional signs, Waka Kotahi has concerns that there is no sound basis for differentiating between off-site directional signs and any other type of off-site sign. For example, a sign promoting a fast food retailer that advises people a distance to the activity may be considered an off-site directional sign if it includes just the business name and directional related words. From a road safety perspective, the effects of this type of sign are the same as the effects of a regular off-site sign used for advertising purposes when located along a state highway.</p> <p>Based on effects, permitting off-site directional signs conflicts with the wider intention of the plan that off-site signs are generally a non-complying activity. It is unclear why off-site directional signs are treated separately to other off-site signs and it is recommended that all provisions relating to off-site directional signs be removed.</p>	
SIGN-P2 Temporary signs	Policy	Support in part	Waka Kotahi supports enabling temporary signs whilst managing their size, height, duration and number in order to maintain transport safety.	Amend SIGN-P2 as follows: <i>Provide for temporary signs relating to a temporary activity, real estate including subdivisions under</i>

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			<p>However, a minor amendment is recommended to this provision to include consideration of the location of temporary signs.</p> <p>It is also recommended that a definition is introduced for a 'temporary sign' (further comments on this matter are provided below regarding SIGN-R4). This would enable a reduction in length of detail for any applicable rules and standards for temporary signage.</p>	<i>development, and local elections while managing their <u>location</u>, size, height, duration and number in order to maintain amenity values and transport safety.</i>
SIGN-P3 Transport safety	Policy	Support in part	Waka Kotahi supports this provision which seeks to ensure signs do not adversely affect transport safety, however a minor amendment to the wording is sought so that potential adverse effects on transport safety can be considered more broadly, rather than being limited to distraction or obstruction.	<p>Amend SIGN-P3 as follows:</p> <p><i>Ensure signs do not adversely affect <u>the safe, efficient and effective operation of the transport system</u> transport safety by causing a distraction or obstruction to road users and pedestrians by:</i></p> <ol style="list-style-type: none"> <i>1. managing the size, number, location, content, illumination, and design of signs;</i> <i>2. limiting digital signs; and</i> <i>3. managing off-site signs in Industrial Zones, and avoiding off-site signs in all other zones.</i>
SIGN-R3 Any community sign	Rule	Support in part	Waka Kotahi is supportive of enabling community signs where they are subject to appropriate controls however, there are concerns about the	Retain SIGN-R3 as notified and further consider the related rule standards.

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			related rule standards as outlined below in SIGN-R4, R5, R6 and R7.	
SIGN-R4 Any temporary sign	Rule	Support in part	<p>Waka Kotahi supports enabling temporary signs whilst managing their effects in order to maintain transport safety. However, the existing provisions relating to temporary signs (including SIGN-R4 and SIGN-S2) are extensive and it is recommended that the framework for managing temporary signs is revised to improve the simplicity and clarity of these provisions. Some recommendations for how this might be achieved are as follows:</p> <ul style="list-style-type: none"> - The inclusion of a definition for a 'temporary sign'. This would enable a reduction in length of detail for any applicable rules and standards for temporary signs. - Simplification of the rule and related standard for temporary signs (a definition may assist). Currently, different provisions in the chapter include signs that 'promote' a temporary activity, signs that 'advertise' a temporary activity, and signs 'relating' to a temporary activity. 	<p>Reconsider the framework for the management of temporary signs to improve the simplicity and clarity of these provisions.</p> <p>Additionally, consider the insertion of a definition for a 'temporary sign'.</p>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			<ul style="list-style-type: none"> - Clarification of whether a temporary sign can include the promotion of a commercial activity such as a retail sales event. - Clarification on the relationship between temporary signs and off-site signs of a temporary nature, such as trailer signs used to promote a temporary event or activity. Again, a definition of a 'temporary sign' may assist. 	
SIGN-R5 Any off-site directional sign	Rule	Oppose	As noted above, Waka Kotahi is concerned that there is no sound basis for differentiating between off-site directional signs and any other type of off-site sign. For example, a sign promoting a fast food retailer that advises people a distance to the activity may be considered an off-site directional sign if it includes just the business name and directional related words. From a road safety perspective, the effects of this type of sign are the same as the effects of a regular off-site sign used for advertising purposes located along a state highway.	Delete all provisions for off-site directional signage. This includes: <ul style="list-style-type: none"> - Removing reference to them from SIGN-P1 (as per submission point above); - Deleting the definition of 'off-site directional signs'; - Delete rule SIGN-R5; and - Delete any reference within other rules, including Table SIGN-S2.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			Based on effects, permitting off-site directional signs conflicts with the wider intention of the plan that off-site signs are generally a non-complying activity. It is unclear why off-site directional signs are treated separately to off-site signs and it is recommended that all provisions relating to off-site directional signs be removed.	
SIGN-R6 Any on-site sign	Rule	Support in part	Waka Kotahi is supportive of enabling on-site signs where they are subject to appropriate controls, however, has some concern about the standards that fall under this rule.	Retain SIGN-R6 as notified and further consider the related rule standards.
SIGN-R7 Any off-site signs	Rule	Support	Waka Kotahi supports Council maintaining discretion over the erection of off-site signs in Industrial Zones, and the use of a Non-Complying activity status in all other zones. Off-site signs have the potential to compromise road safety (for example by causing driver distraction or a traffic hazard) or cause confusion with official road signs. Therefore, it is necessary to control their size, design, location and management to ensure the safe, effective and efficient operation of the state highway network.	Retain as notified.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
SIGN-S1 Transport Safety	Standard	Support in part	<p>Waka Kotahi supports the inclusion of a standard to address transport safety considerations. However, minor amendments are recommended to the wording of this provision as follows:</p> <ul style="list-style-type: none"> - Replace 'transport sign' with 'an official sign used for transport purposes'. 'Transport sign' is not a term that has been used throughout the plan, nor is it defined. The proposed amendment is consistent with predefined terms in the plan and is considered to have the same intended meaning. - Remove reference to a 'transport signal;'. A transport signal is a traffic control device, not a sign. - Minor amendment to the provision relating to lights to also include intermittently illuminated lights. - The inclusion of minimum lettering sizes for 50km/h and 60km/h speed zones. There are several sections of strategic or arterial roads to which these lower speed limits apply, and 	<p>Amend SIGN-S1 as follows:</p> <p><i>1. Any sign, other than <u>an official sign used for transport purposes</u> a transport sign or signal, shall:</i></p> <ul style="list-style-type: none"> <i>a. not have movable parts, including captive blimps or balloons, but excluding flags and banners;</i> <i>b. not have contain flashing, or revolving <u>or intermittently illuminated</u> lights;</i> <i>c. not be reflective upon exposure to artificial light;</i> <i>d. not have sound effects;</i> <i>e. not resemble a transport sign <u>an official sign used for transport purposes or traffic signal</u>;</i> <i>f. not be located in a position that impairs a road user's view of any transport sign <u>official sign used for transport purposes or traffic signal</u>;</i> <i>g. not overhang the road reserve of a State Highway; or</i> <i>h. not obstruct the movement of any pedestrian, motorist, or cyclist;</i> <i>i. not be located within any road corridor;</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought																												
			therefore lettering size still needs to be managed in these areas.	<p><i>j. comply with the following minimum lettering sizes in Table SIGN-1 where visible from a strategic road or arterial road with the following speed limits:</i></p> <p><i>Table SIGN-1: Minimum lettering sizes</i></p> <table><tr><th><i>Regulatory speed limit of adjoining road</i></th><th><i>Business / property name</i></th><th><i>Main message</i></th><th><i>Secondary message</i></th></tr><tr><th><i>Km/h</i></th><th colspan="3"><i>Minimum lettering height (mm)</i></th></tr><tr><td><u>50</u></td><td><u>100</u></td><td><u>150</u></td><td><u>75</u></td></tr><tr><td><u>60</u></td><td><u>125</u></td><td><u>175</u></td><td><u>90</u></td></tr><tr><td>70</td><td>150</td><td>200</td><td>100</td></tr><tr><td>80</td><td>175</td><td>250</td><td>125</td></tr><tr><td>100</td><td>200</td><td>300</td><td>150</td></tr></table>	<i>Regulatory speed limit of adjoining road</i>	<i>Business / property name</i>	<i>Main message</i>	<i>Secondary message</i>	<i>Km/h</i>	<i>Minimum lettering height (mm)</i>			<u>50</u>	<u>100</u>	<u>150</u>	<u>75</u>	<u>60</u>	<u>125</u>	<u>175</u>	<u>90</u>	70	150	200	100	80	175	250	125	100	200	300	150
<i>Regulatory speed limit of adjoining road</i>	<i>Business / property name</i>	<i>Main message</i>	<i>Secondary message</i>																													
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80	175	250	125																													
100	200	300	150																													
SIGN-S2 Maximum number, area and height of signs per site	Standard	Support in part	Waka Kotahi support managing the number, area and height of signs to ensure the safe, effective and efficient operation of the state highway network. However, it is recommended that further consideration be given to the structure and details	Further consider the aspects of this standard which relate to temporary signs to improve the simplicity and clarity of these provisions. Delete all provisions for off-site directional signage.																												

Item	Proposed Plan Amendment Section	Support / Support in Part / Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			of this standard in line with the previous comments provided on temporary signs and off-site directional signs.	
SIGN-S3 Digital	Standard	Support in part	Waka Kotahi supports this provision to manage aspects of digital signs that can adversely affect the safe, efficient and effective operation of the state highway network. However, it is recommended that two additional matters are included within the standard relating to transitions between still images and lighting control. These additional matters need to be managed effectively to mitigate adverse effects on transport safety, particularly transitions between images.	<p>Amend SIGN-S3 as follows:</p> <ol style="list-style-type: none"> <i>The digital sign shall only be located within any Commercial and Mixed Use Zones, Industrial Zones, Sport and Active Recreation Zone, Special Purpose Zone (Museum and Conference Centre), Special Purpose Zone (Hospital), Special Purpose Zone (Kaiapoi Regeneration), or Special Purpose Zone (Pegasus Resort);</i> <i>The digital sign shall have a maximum sign display area of 3m² per site;</i> <i>There shall be a maximum of one digital sign per site;</i> <i>The digital sign shall display static images or messages only;</i> <i>The digital sign shall display maximum of two different images or messages within a 24-hour period;</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/ Reasons	Relief Sought
				<p>6. <u>There shall be no transitions between still images apart from cross-dissolve of a maximum of 0.5 seconds;</u></p> <p>7. <u>The display time for each image or message on the digital sign shall be a minimum of one hour;</u></p> <p>8. <u>The screen shall incorporate lighting control to adjust brightness in line with ambient light levels;</u></p> <p>9. <u>The digital sign shall be operated with a fail-safe feature where in the event of a malfunction, the images or messages will be replaced by a solid black colour until the malfunction is resolved;</u></p> <p>10. <u>The digital sign shall not be located within any natural character of scheduled freshwater body setback;</u></p> <p>11. <u>The digital sign shall not be located within any ONF, ONL, SAL, HNC, VHNC or ONC; and</u></p> <p>12. <u>The digital sign shall be set back a minimum of 20m from any Residential Zones, Rural Zones, Open Space Zone, Natural Open</u></p>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
				<i>Space Zone, any natural character of scheduled freshwater body setback, ONL, ONF, SAL, HNC, VHNC, or ONC.</i>
SIGN-AN1	Advice Note	Support	Waka Kotahi supports the inclusion of an advice note which directs plan users to <i>'Bylaw 2010 New Zealand Transport Agency (Signs on State Highways) Bylaw'</i> for signs located within state highway road reserve, and notes that Waka Kotahi NZ Transport Agency may have an interest in any application for a sign that is visible from a state highway.	Retain as notified.
SIGN-MD1 Transport Safety	Matters of Discretion	Support in part	Waka Kotahi supports this provision which provides Council with discretion to consider adverse effects from signs on transport safety. However, a minor amendment to the wording is sought so that potential adverse effects on transport safety can be considered more broadly, rather than being limited to distraction or obstruction. This same approach is applied to digital signs where it is recommended that 'transitions' be changed to 'operation' so that the operational effects of digital signs can be	Amend SIGN-MD1 as follows: <i>Transport safety</i> 1. <i>The extent to which the sign's size, location, design, content, illumination, and any digital operation transitions, could adversely affect the safe, efficient and effective operation of the transport system transport safety, cause confusion, distraction or an obstruction to any road user.</i> 2. <i>The complexity and sensitivity of the receiving environment.</i>

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			considered in their entirety, rather than being limited to the effect of transitions.	
TEMP – Nga mahi taupua – Temporary activities				
TEMP -R3 Mobile trading on public land	Rule	Oppose in part	This rule permits mobile trading on public land. Waka Kotahi request clarification from the Council that public land does not include the state highway road reserve.	<p>Include a definition for public land and ensure this definition does not include the state highway road reserve. Or alternatively, amend the rule to include the following:</p> <p><i>TEMP -R3 Mobile trading on public land</i> Activity status when compliance not achieved: N/A DIS</p> <p><i>All zones</i> <i>Activity status: PER</i> <i>Where</i> 1. <u>Mobile trading is not located within any state highway road reserve.</u></p> <p>Advisory Note A Mobile Trading Licence may be required for the occupation of public spaces.</p>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
TEMP -R9 Temporary activity	Rule	Support	Waka Kotahi support the exemption of this rule – that this does not apply to activities within the road reserve.	Retain as notified.
TEMP-AN1	Advice Note	Support subject to amendment	Advice Note TEMP-AN1 makes the plan user aware that permission from the District Council must be obtained for all temporary activities in the road. This should also cover Waka Kotahi for any activities within the state highway road reserve. For any activity on a Limited Access Road, any change in use will trigger the need for approval from Waka Kotahi NZ Transport Agency under the Government Roding Powers Act. It is appropriate for this to be highlighted to plan users through an advice note.	<p>Insert the following in the advice note:</p> <p><i>Temporary activities within a public space:</i></p> <ul style="list-style-type: none"> <i>Permission from the District Council must be obtained for all temporary activities on a public space including on reserves and roads. <u>For any temporary activity within the state highway road reserve permission is required from Waka Kotahi NZ Transport Agency....</u></i> <p><i>Other controls:</i></p> <ul style="list-style-type: none"> <i>Regulations and bylaws that may also apply include the Camping-Grounds Regulations 1985, Amusement Devices Regulations 1978, Civil Aviation Act 1990; and bylaws e.g. Alcohol Control Bylaw 2018, Signage Bylaw 2019, Waimakariri District Council Parking Bylaw 2019, and Solid Waste and Waste Handling Licensing Bylaw 2016 <u>and</u> Government Roding Powers Act 1989.</i>
Part 3 – Area specific matters				

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
Zones				
RURZ – Rural zones				
RURZ-P7 Retail activities	Policy	Support in part	Waka Kotahi suggest that further consideration should be given to the effects on the transport network from rural retail activities and seek that the policy be amended to reflect this.	Amend RURZ-P7 as follows: <i>In relation to retail activity:</i> <ol style="list-style-type: none"> <i>new retail activity be limited to that associated with a home business, selling products directly produced in the Rural Zones, or selling products or services directly supporting primary production; providing that:</i> <ol style="list-style-type: none"> <i>to the extent practicable adverse effects of the activity are internalised within the site; and</i> <i>amenity values and the character of Rural Zones are maintained; and</i> <i>adverse effects on the safe and efficient functioning of the transport system are avoided or mitigated.</i> <i>the expansion of any existing retail activity shall:</i> <ol style="list-style-type: none"> <i>manage any additional adverse effects including visual, traffic, dust, noise, odour, or lighting so as to maintain the amenity values and character of the zone and the safe and efficient functioning of the transport system; ...</i>
GRUZ-R7	Rule	Support in part	This rule permits visitor accommodation activities subject to complying with various requirements.	Amend Rule GRUZ-R7 as follows: Activity status: PER

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Visitor accommodation			Waka Kotahi notes that where a new visitor accommodation activity is established which requires a new vehicle accessway to be formed off a state highway, the accessway will be subject to the requirements of TRAN-R6. Waka Kotahi consider that where a new visitor accommodation activity is established off the state highway, but which has an existing accessway, it is appropriate for the accessway to be upgraded to meet the same requirements.	<p><i>Where:</i></p> <ol style="list-style-type: none"> <i>the activity shall be undertaken within a residential unit, minor residential unit or accessory building; and</i> <i>a maximum of eight visitors shall be accommodated per site; and</i> <i><u>where the activity is accessed off a state highway, any existing vehicle crossing shall comply, or be upgraded to comply, with TRAN-S5.</u></i>
GRUZ-R10 Rural produce retail	Rule	Support in part	This rule permits rural produce retail activities subject to complying with various requirements. Waka Kotahi notes that where a new rural produce retail activity is established which requires a new vehicle accessway to be formed off a state highway, the accessway will be subject to the requirements of TRAN-R6. Waka Kotahi considers that where a new rural produce retail activity is established off a state highway, but which has an	<p>Amend Rule GRUZ-R10 as follows: Activity status: PER</p> <p><i>Where:</i></p> <ol style="list-style-type: none"> <i>rural produce retail activity exceeds 5m² any retail sales activity shall be located a minimum of 10m from the site boundary;</i>

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			existing accessway, it is appropriate for the accessway to be upgraded to meet the same requirements.	<ol style="list-style-type: none"> 2. <i>there shall be only one retail sales activity per site; and</i> 3. <i>the maximum NFA or land area used for any retail sales activity shall be 50m²; and</i> 4. <i><u>where the activity is accessed off a state highway, any existing vehicle crossing shall comply, or be upgraded to comply, with TRAN-S5.</u></i>
GRUZ-R11 Rural industry	Rule	Support in part	This rule permits rural industries subject to complying with various requirements. These requirements allow for a rural industry of a reasonable scale to establish off a state highway, without the ability to consider the effects of the activity on the safe and efficient functioning of the road. Waka Kotahi requests that an additional restriction is added, such that where a rural industry obtains access off a state highway, resource consent as a Restricted Discretionary activity is required.	<p>Amend GRUZ-R11 as follows: Activity status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> 1. <i>a maximum of five staff shall work on the site at any one time;</i> 2. <i>the manufacture, processing or production of goods involves initial or further processing of commodities derived from primary production;</i> 3. <i>the maximum GFA occupied for the rural industry shall be 250m²;</i>

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				<p>4. the maximum GFA occupied for the rural industry within a SASM shall be 150m²;</p> <p>5. the maximum land area occupied for the rural industry shall be 500m²;</p> <p>6. any retail sales area shall be set back a minimum of 10m from the site boundary;</p> <p>7. the retail sale of goods on the site is restricted to those manufactured, produced or processed on the site;</p> <p>8. the maximum NFA or land area occupied for retail sales shall be 50m²; and</p> <p>9. any buildings, yard, storage, or parking areas associated with the activity shall not be located within 60m of any residential unit, or other sensitive activity, located on a site other than where the rural industry is occurring; <u>and</u></p> <p>10. <u>the activity shall not be accessed off a state highway.</u></p> <p>Activity status when compliance with GRUZ-R11 (6), or (9) or (10) not achieved: RDIS.</p>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
RLZ-R7 Visitor accommodation	Rule	Support in part	This rule permits visitor accommodation activities subject to complying with various requirements. Waka Kotahi notes that where a new visitor accommodation activity is established which requires a new vehicle accessway to be formed off a state highway, the accessway will be subject to the requirements of TRAN-R6. Waka Kotahi consider that where a new visitor accommodation activity is established off the state highway, but which has an existing accessway, it is appropriate for the accessway to be upgraded to meet the same requirements.	Amend Rule RLZ-R7 as follows: <i>Activity status: PER</i> <i>Where:</i> <ol style="list-style-type: none"> <i>the activity shall be undertaken within a residential unit, minor residential unit or accessory building; and</i> <i>a maximum of eight visitors shall be accommodated per site; and</i> <i><u>where the activity is accessed off a state highway, any existing vehicle crossing shall comply, or be upgraded to comply, with TRAN-S5.</u></i>
RLZ-R10 Rural produce retail	Rule	Support in part	This rule permits rural produce retail activities subject to complying with various requirements. Waka Kotahi notes that where a new rural produce retail activity is established which requires a new vehicle accessway to be formed off a state highway, the accessway will be subject to the requirements of TRAN-R6. Waka Kotahi consider	Amend Rule RLZ-R10 as follows: <i>Activity status: PER</i> <i>Where:</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			that where a new rural produce retail activity is established off a state highway, but which has an existing accessway, it is appropriate for the accessway to be upgraded to meet the same requirements.	<ol style="list-style-type: none"> 1. <i>rural produce retail activity exceeds 5m² any retail sales activity shall be located a minimum of 10m from the site boundary;</i> 2. <i>there shall be only one retail sales activity per site; and</i> 3. <i>the maximum NFA or land area used for any retail sales activity shall be 50m².; and</i> 4. <i><u>where the activity is accessed off a state highway, any existing vehicle crossing shall comply, or be upgraded to comply, with TRAN-S5.</u></i>
RLZ-R11 Rural industry	Rule	Support in part	This rule permits rural industries subject to complying with various requirements. These requirements allow for a rural industry of a reasonable scale to establish off a state highway, without the ability to consider the effects of the activity on the safe and efficient functioning of the road. Waka Kotahi requests that an additional restriction is added, such that where a rural industry obtains access off a state highway,	<p>Amend RLZ-R11 as follows: Activity status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> 1. <i>a maximum of five staff shall work on the site at any one time;</i> 2. <i>the manufacture, processing or production of goods involves initial or further processing of</i>

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			resource consent as a Restricted Discretionary activity is required.	<p><i>commodities derived from primary production;</i></p> <p>3. <i>the maximum GFA occupied for the rural industry shall be 250m²;</i></p> <p>4. <i>the maximum GFA occupied for the rural industry within a SASM shall be 150m²;</i></p> <p>5. <i>the maximum land area occupied for the rural industry shall be 500m²;</i></p> <p>6. <i>any retail sales area shall be set back a minimum of 10m from the site boundary;</i></p> <p>7. <i>the retail sale of goods on the site is restricted to those manufactured, produced or processed on the site;</i></p> <p>8. <i>the maximum NFA or land area occupied for retail sales shall be 50m²; and</i></p> <p>9. <i>any buildings, yard, storage, or parking areas associated with the activity shall not be located within 60m of any residential unit, or other sensitive activity, located on a site other than where the rural industry is occurring-; and</i></p>

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				<p><i>10. <u>the activity shall not be accessed off a state highway.</u></i></p> <p><i>Activity status when compliance with RLZ-R11 (6), or (9) or (10) not achieved: RDIS.</i></p>
Development Areas				
Existing Development Areas				
NWR – Northwest Rangiora				
NWR - Northwest Rangiora Development Area	Existing Development Area	Support in part	While the Northwest Rangiora Development Area is located outside of the Projected Infrastructure Boundary this area has previously been identified for further development. Further greenfield development outside of the Projected Infrastructure Boundary is likely to encourage the use of private vehicle use and proposed pedestrian and cycle connections are limited and no public transport connections are identified.	Better cycle and pedestrian connections should be included in the ODP.
SBT – South Belt				
SBT – South Belt Development Area	Existing Development Area	Support	The South Belt Development Area is located within the Projected Infrastructure Boundary and further residential development is anticipated in this location by the Greater Christchurch partnership.	Retain as notified.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
KLFR – Kaiapoi Large Format Retail				
KLFR – Kaiapoi Large Format Retail Development Area	Existing Development Area	Support	This development area is located within the Projected Infrastructure Boundary and is considered appropriate.	Retain as notified.
OHOK – Bradleys Road Ohoka				
OHOK – Bradleys Road Ohoka Development Area	Existing Development Area	Neutral	While this development area is located outside of the Projected Infrastructure Boundary it has previously been identified for further development.	Retain as notified.
WKP – West Kaiapoi				
WKP – West Kaiapoi Development Area	Existing Development Area	Support	This development area is located within the Projected Infrastructure Boundary and is considered appropriate.	Retain as notified.
EKP – East Kaiapoi				
EKP – East Kaiapoi Development Area	Existing Development Area	Support	This development is located within the Projected Infrastructure Boundary and is considered appropriate.	Retain as notified.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
MILL – Mill Road Ohoka				
MILL – Mill Road Ohoka Development Area	Existing Development Area	Neutral	While this development area is located outside of the Projected Infrastructure Boundary, it has previously been identified for future development.	Retain as notified.
NWD – North Woodend				
NWD – North Woodend Development Area	Existing Development Area	Support	This development area is located outside of the Projected Infrastructure Boundary.	Retain as notified.
SBK – Southbrook				
SBK – Southbrook Development Area	Existing Development Area	Neutral	This development area is located outside of the Projected Infrastructure Boundary and is identified for future industrial, commercial and mixed-use zones. This is a rollover from the Operative District Plan and there are suitable rules in the transport chapter to manage any new access to the state highway and high trip generation rules. State Highway 71 at this location is a Limited Access Road and any new access to the state highway will require approval from Waka Kotahi under the Government Rounding Powers Act.	Retain as notified.

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EWD – East Woodend				
EWD – East Woodend Development Area	Existing Development Area	Support in part	The Development Area is partially located within the Projected Infrastructure Boundary. The development area, while a rollover from the operative district plan, is located outside of the Projected Infrastructure Boundary. The eastern extension is located within the Projected Infrastructure Boundary and is considered to be a logical extension, however, the remaining area is not immediately adjoined to other rural zones and therefore, pedestrian and cycle connections may not be frequently used.	That further consideration is given to intensification of this area.
MPH – Mapleham				
MPH – Mapleham Development Area	Existing Development Area	Support in part	This development area is located outside of the Projected Infrastructure Boundary. The Activity Rule DEV-MPH-R1 refers to access from State Highway 1, however, there is no access from the development area (existing or proposed). Waka Kotahi believes this may be a drafting error and rather, instead of State Highway 1 this should refer to Pegasus Boulevard.	Amend DEV-MPH-R1: Specific density provisions as follows: <i>Access to State Highway 1 <u>Pegasus Boulevard</u> from the DEV-MPH-APP1 area shall be limited to the two locations (Mapleham Drive) as shown on DEV-MPH-APP1, provided that:</i> <i>1. one access road located near the northern boundary of the zone shall serve a maximum of four sites; and</i>

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				2. <i>the access road located near the southern boundary of the zone shall serve all other sites in the zone and shall adjoin the common boundary of the adjacent property to the south for a minimum distance of 30m from State Highway 1 Pegasus Boulevard into the zone.</i>
NRG – North Rangiora				
NRG – North Rangiora Development Area	Existing Development Area	Support	This development is located within the Projected Infrastructure Boundary and is considered appropriate.	Retain as notified.
PEG – Pegasus				
PEG – Pegasus Development Area	Existing Development Area	Support	This development is located within the Projected Infrastructure Boundary and is considered appropriate.	Retain as notified.
New Development Areas				
WR – West Rangiora				
WR – West Rangiora Development Area	New Development Area	Support	The West Rangiora Development Area is located within the Projected Infrastructure Boundary and further residential development is anticipated at this location by the Greater Christchurch	Further consider the area zoned Medium Density Residential Zone (and the potential to increase this area). However, Waka Kotahi recognise that further consideration is likely to be required under the

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			partnership. Waka Kotahi supports the inclusion of a Medium Density Residential Zone, however, further consideration could be given to increasing the size of this zone to encourage densification.	National Planning Standard for Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.
NER – North East Rangiora				
NER – North East Rangiora Development Area	New Development Area	Support	The North East Rangiora Development Area is located within the Projected Infrastructure Boundary and further residential development is anticipated at this location by the Greater Christchurch partnership. Waka Kotahi supports the inclusion of a Medium Density Residential Zone, however, further consideration could be given to increasing the size of this zone to encourage densification and better multi-modal and public transport connections to meet UFD-P2.	Further consider the area zoned Medium Density Residential Zone (and the potential to increase this area) and incorporate better multi-modal and public transport connections into the ODP to better reflect UFD-P2.
SER – South East Rangiora				
SER – South East Rangiora Development Area	New Development Area	Support	The South East Rangiora Development Area is located within the Projected Infrastructure Boundary and further residential development is anticipated at this location by the Greater Christchurch partnership. Waka Kotahi supports the inclusion of a Medium Density Residential Zone,	Further consider the area zoned Medium Density Residential Zone (and the potential to increase this area). However, Waka Kotahi recognise that further consideration is likely to be required under the National Planning Standard for Urban Development

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
			however, further consideration could be given to increasing the size of this zone to encourage densification as the land proposed to be zoned Medium Density is limited in this Development Area. The proposed development area ODP shows good cycleway connections to the wider Rangiora township.	and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.
K – Kaiapoi				
K – Kaiapoi Development Area	New Development Area	Support	The Kaiapoi Development Area is located within the Projected Infrastructure Boundary and further residential development is anticipated at this location by the Greater Christchurch partnership. Waka Kotahi supports the inclusion of a Medium Density Residential Zone, however, further consideration could be given to increasing the size of this zone to encourage densification as the land proposed to be zoned Medium Density is limited in this Development Area. Further consideration to connections for active transport modes is required to reduce private vehicle reliance, including connections to the existing bus stops (park and ride locations) in Kaiapoi.	Further consider the area zoned Medium Density Residential Zone (and the potential to increase this area) and incorporate better multi-modal and public transport connections into the ODP to better reflect UFD-P2.

Item	Proposed Plan Amendment Section	Support / Support in Part/ Oppose / Oppose in Part	Comments/Reasons	Relief Sought
Designations				
Rangiora East Road Connection (Waimakariri District Council)	Designations (WDC-47)	Support	The proposed designation provides ample space for different intersection (roundabout) options. Waka Kotahi have been in discussions with the Council regarding this designation and the proposed alignment provides for the preferred roundabout design/location. Given that the Council will be required to engage with Waka Kotahi to determine an appropriate intersection design, the proposed designation is considered appropriate.	Retain as notified.